

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al <i>Plaintiffs,</i>	§ § §	
v.	§	Case No.: 1:21-CV-0780-XR,
GREGORY W ABBOTT, et al, <i>Defendants.</i>	§ § § § §	consolidated with 5:21-CV-0844-XR

**ORIGINAL ANSWER OF DEFENDANT ISABEL LONGORIA, IN HER OFFICIAL
CAPACITY AS THE HARRIS COUNTY ELECTIONS ADMINISTRATOR**

Defendant ISABEL LONGORIA, in her official capacity as the Harris County Elections Administrator (“Defendant” or “Defendant Longoria”) now files her Original Answer to Plaintiffs OCA-Greater Houston, League of Women Voters Texas, REVUP-Texas, Texas Organizing Project, and Workers Defense Action Fund’s (“Plaintiffs”) Original Complaint (“Complaint”) and would respectfully show this Court as follows. Each numbered response corresponds with the same numbered paragraph in the Complaint.

1. Defendant admits the allegations in this paragraph.
2. Defendant admits the allegations in this paragraph.
3. Defendant admits the allegations in this paragraph.
4. Defendant admits that S.B. 1 takes particular aim at voters with disabilities and voters with limited English proficiency, who are overwhelmingly voters of color. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

5. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

6. Defendant admits the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the second sentence of this paragraph. Defendant admits that plaintiffs seek judicial relief under the Voting Rights Act, the Civil Rights Act, the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and the United States Constitution. The last sentence of this paragraph consists of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

7. Defendant admits the allegations in this paragraph.

8. Defendant admits the allegations in this paragraph.

9. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

10. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

11. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

12. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

13. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

14. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

15. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

16. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

17. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

18. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

19. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

20. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

21. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

22. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

23. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

24. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

25. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

26. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

27. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

28. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

29. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

30. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

31. Defendant denies that Jose Esparza is the current Acting Secretary of State. Defendant admits the remaining allegations in this paragraph.

32. Defendant admits the allegations in this paragraph.

33. Defendant admits the allegations in this paragraph.

34. Defendant admits the allegations in this paragraph.

35. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

36. Defendant admits the allegations in this paragraph.

37. The allegations in the first and second sentences of this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the

first and second sentences of this paragraph. Defendant admits the remaining allegations in this paragraph.

38. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

39. Defendant admits the allegations in this paragraph.

40. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

41. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

42. Defendant admits the allegations in this paragraph.

43. Defendant admits the allegations in this paragraph.

44. Defendant admits the allegations in this paragraph.

45. Defendant admits the allegations in this paragraph.

46. Defendant admits that Texas legislators and officials have repeatedly used the justification of voter fraud as a pretext to justify discriminatory laws. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

47. Defendant admits that Texas was covered by preclearance. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

48. Defendant admits the allegations in this paragraph.

49. Defendant admits the allegations in this paragraph.

50. Defendant admits the allegations in this paragraph.

51. Defendant admits that, in 2019, Harris County entered into a settlement agreement with the Department of Justice regarding the accessibility of polling places. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in the paragraph.

52. Defendant admits that Texas has restrictive voting laws and that history shows that the burdens of restrictive voting laws fall most heavily on voters of color, voters with disabilities, voters with limited English proficiency, and young and first-time voters. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

53. Defendant admits the allegations in this paragraph.

54. Defendant admits the allegations in this paragraph.

55. Defendant denies that Texas closed polling places between 2012 and 2019. Defendant admits the remaining allegations in this paragraph.

56. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

57. Defendant admits the allegations in this paragraph.

58. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

59. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

60. Defendant admits the allegations in this paragraph.

61. Defendant admits the allegations in this paragraph.

62. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

63. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

64. Defendant admits the allegations in this paragraph.

65. Defendant admits that Harris County took measures to increase voter participation, including the extension of early voting hours, access to drive-thru voting, and education about and easier access to forms for voters eligible to vote by mail. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in the first sentence of this paragraph. The second sentence of this paragraph consists of legal conclusions that are not subject to admission or denial.

66. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

67. Defendant admits the allegations in this paragraph.

68. Defendant admits the allegations in this paragraph.

69. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

70. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the second and third sentences of this paragraph. Defendant admits the remaining allegations in this paragraph.

71. Defendant admits the allegations in this paragraph.

72. Defendant admits the allegations in this paragraph.

73. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the second sentence of this paragraph. Defendant admits the remaining allegations in this paragraph.

74. Defendant admits the allegations in this paragraph.

75. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

76. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

77. Defendant admits the allegations in this paragraph.

78. Defendant admits the allegations in this paragraph.

79. Defendant admits that plaintiffs challenge the sections of S.B. 1 enumerated in this paragraph.

80. Defendant admits the allegations in this paragraph.

81. Defendant admits the allegations in this paragraph.

82. Defendant denies that Sections 5.06 or 5.10 require the information stated in this paragraph, or that any of the listed sections contain requirements regarding carrier envelopes. Defendant admits the remaining allegations in this paragraph.

83. Defendant admits the allegations in this paragraph.

84. Defendant admits the allegations in this paragraph.

85. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

86. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

87. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

88. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

89. Defendant admits the allegations in this paragraph.

90. Defendant admits the allegations in this paragraph.

91. Defendant admits the allegations in this paragraph.

92. Defendant admits the allegations in this paragraph.

93. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

94. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the last sentence of this paragraph. Defendant admits the remaining allegations in this paragraph.

95. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

96. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

97. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

98. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

99. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

100. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

101. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

102. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

103. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

104. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

105. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

106. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

107. Defendant admits the allegations in this paragraph.

108. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

109. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

110. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

111. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.

112. Defendant admits the allegations in this paragraph.

113. Defendant admits the allegations in this paragraph.

114. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

115. Defendant admits the first sentence of this paragraph. The allegations in the second sentence of this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

116. Defendant admits the first sentence of this paragraph. The remaining allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

117. Defendant admits the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

118. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

119. Defendant denies that she has excluded or continues to exclude Plaintiffs or other voters from participation in voting or that she has denied them benefits or discriminated against them. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

120. Defendant denies that her actions have caused Plaintiffs any harm. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

121. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.

122. Defendant admits the allegations in this paragraph.

123. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

124. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

125. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

126. Defendant denies that she has discriminated or continues to discriminate against Plaintiffs and their members. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

127. Defendant denies that her actions have caused Plaintiffs any harm. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

128. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

129. Defendant admits that plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to recover attorneys' fees or costs from Defendant Longoria.

130. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

131. Defendant admits the allegations in this paragraph.

132. Defendant admits the allegations in this paragraph.

133. Defendant admits the allegations in this paragraph.

134. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

135. Defendant admits the allegations in this paragraph.

136. Defendant admits the allegations in this paragraph.

137. Defendant admits the allegations in this paragraph.

138. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

139. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph

140. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

141. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

142. Defendant admits the allegations in this paragraph.

143. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph

144. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph

145. Defendant admits the allegations in this paragraph.

146. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

147. Defendant admits the allegations in this paragraph.

148. Defendant admits the allegation in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

149. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

150. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

151. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

152. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

153. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

154. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

155. Defendant admits the allegations in this paragraph.

156. Defendant admits the allegations in this paragraph.

157. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a response is required, Defendant admits the allegations regarding the broad interpretation of assistance with voting set out in the VRA, and lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

158. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

159. Defendant admits the allegations in this paragraph.

160. Defendant admits that plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.

161. Defendant admits the allegations in this paragraph.

162. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

163. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

164. Defendant denies that she has excluded or continues to exclude Plaintiffs or other voters from participation in voting or denied Plaintiffs benefits or discriminated against them. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

165. Defendant denies that her actions have caused Plaintiffs any harm. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

166. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to recover attorneys' fees or costs from Defendant Longoria.

167. Defendant admits the allegations in this paragraph.

168. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

169. Defendant denies that she has failed to meet any obligations to provide Plaintiffs or other voters with disabilities an opportunity to vote that is equal to the opportunity provided to voters without disabilities. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

170. Defendant denies that she has discriminated or continues to discriminate against Plaintiffs and their members. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

171. Defendant denies that her actions have caused Plaintiffs any harm. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

172. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

173. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.

174. Defendant admits the allegations in this paragraph.

175. Defendant admits that S.B. 1 Section 7.04 is substantially overbroad and vague. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

176. Defendant admits that S.B. 1 violates the First Amendment to the United States Constitution. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

177. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

178. Defendant admits the allegations in this paragraph.

179. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

180. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

181. Defendant admits that S.B. 1 vaguely defines “benefit” as “anything reasonably regarded as a gain or advantage.” Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

182. Defendant admits the allegations in this paragraph.

183. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

184. Defendant admits the allegations in this paragraph.

185. Defendant admits the allegations in this paragraph.

186. Defendant admits the allegations in this paragraph.

187. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

188. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

189. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

190. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

191. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

192. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

193. Defendant admits the allegations in this paragraph.

194. Defendant admits the allegations in this paragraph.

195. Defendant admits that Section 7.04's prohibition on so-called "vote harvesting" is unconstitutionally overbroad. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

196. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

197. Defendant admits that the so-called "vote harvesting" provision of S.B. 1 is unconstitutionally overbroad. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

198. Defendant admits that Section 7.04 of S.B.1 regulates a substantial amount of constitutionally protected expression and is unconstitutionally overbroad.

199. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

200. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

201. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

202. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

203. Defendant admits the allegations in this paragraph.

204. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.

205. Defendant admits the allegations in this paragraph.

206. Defendant admits the allegations in this paragraph.

207. Defendant admits the allegations in this paragraph.

208. Defendant admits that the provision banning ballot collection is vague. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

209. Defendant admits the allegations in this paragraph.

210. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

211. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

212. Defendant admits the allegations in this paragraph.

213. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

214. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

215. Defendant admits the allegations in this paragraph.

216. Defendant admits the allegations in this paragraph.

217. Defendant admits that Section 7.04 of S.B. 1 is unconstitutionally vague in violation of the Due Process Clause and the First Amendment.

218. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.

Respectfully submitted,

CHRISTIAN D. MENEFEE
HARRIS COUNTY ATTORNEY

JONATHON G.C. FOMBONNE
FIRST ASSISTANT
COUNTY ATTORNEY

TIFFANY S. BINGHAM
MANAGING ATTORNEY,
AFFIRMATIVE LITIGATION

/s/ Sameer Birring

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**ATTORNEYS FOR DEFENDANT,
HARRIS COUNTY ELECTIONS
ADMINISTRATOR, ISABEL
LONGORIA, IN HER INDIVIDUAL
CAPACITY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on October 25, 2021, in compliance with the Federal Rules of Civil Procedure to all parties of record.

/s/ Sameer S. Birring
SAMEER S. BIRRING
ASSISTANT COUNTY ATTORNEY